

Agenda

Item #5



STATE OF MAINE
COMMISSION ON GOVERNMENTAL ETHICS
AND ELECTION PRACTICES
135 STATE HOUSE STATION
AUGUSTA, MAINE
04333-0135

To: Commission Members
From: Jonathan Wayne, Executive Director
Date: October 22, 2007
Re: Guidance on New Requirement for Lobbyists to Report Communications with
Executive Branch Officials

Lobbyists in Maine must register with the Ethics Commission and file monthly and annual reports of their activity. Among other things, these reports disclose the client that has employed the lobbyist, the bills and other matters lobbied for that client, the compensation received from the client, and expenditures made in the course of lobbying. I have attached an example of the monthly reporting form that must be completed on-line by lobbyists.

Until September 2007, lobbyist reports covered communications that the lobbyist made to officials in the legislative branch for the purpose of influencing legislation. Earlier this year, the Legislature enacted Chapter 373 of the Public Laws of 2007. The law required lobbyists to begin reporting communications with officials in the executive branch and with constitutional officers.

The requirement went into effect on September 20, 2007. In response to requests for clarification from lobbyists, the Commission staff has drafted for your consideration general guidance on the new reporting requirement. On October 4, 2007, the staff circulated the guidance in draft form to all registered lobbyists and invited them to submit comments within two weeks. One lobbyist responded with informal suggestions, and Kristine Ossenfort, a lobbyist for the Maine State Chamber of Commerce, highlighted some additional issues in need of clarification. In response to the lobbyists' comments and questions, the staff made some changes to the draft guidance which is shaded.

Please note that on one issue of interpretation, I have provided two options for your consideration. The definition of lobbying includes "time spent to prepare and submit to the Governor, an official in the legislative branch, an official in the executive branch, a constitutional officer, or a legislative committee oral and written proposals for, or testimony or analyses concerning, a legislative action." Some lobbyists have inquired whether the reporting requirement includes a "clawback" that would apply to quantitative analysis or legislative drafting which was not originally intended to be submitted to a government official. The issue of concern is if the lobbyist or client later decides to submit the analysis or draft legislation to a covered official, it may be difficult to quantify the compensation received or expenditures made months or years earlier.

If you approve of the guidance, the Commission staff would circulate it to lobbyists and post it to the Commission website as final advice. Thank you for your considering it.

OFFICE LOCATED AT: 242 STATE STREET, AUGUSTA, MAINE
WEBSITE: WWW.MAINE.GOV/ETHICS

Guidance on Reporting Executive Branch Lobbying

Lobbyists are now required to report lobbying of executive branch officials and constitutional officers. (Chapter 373 of the Public Laws of 2007, effective September 20, 2007.) This memo offers advice on the new requirement.

CHANGES TO THE DEFINITION OF LOBBYING

How has Chapter 373 changed the definition of lobbying?

Lobbying is defined in the lobbyist disclosure law at 3 M.R.S.A. § 312-A(9), which is attached. To count as lobbying, a communication by a lobbyist must have three elements. It must:

①	②	③
be made for the purpose of influencing	a covered governmental official	regarding legislative action

The primary change made by Chapter 373 was to add new categories of governmental officials covered by the lobbyist disclosure law: the staff and cabinet of the Governor, certain agency officials, and the state's constitutional officers. Some agencies covered by the law are independent but in this memo the Commission will use the term "executive branch agencies" to refer to all agencies covered by the law, regardless of whether they are technically a part of the executive branch. The term "official in the executive branch" is defined in 3 M.R.S.A. § 312-A(10-C) and refers to specific employees in major policy-influencing positions within these agencies, now covered under this law.

In addition to communicating with covered officials, are there other activities that constitute lobbying?

In addition to communicating, lobbying includes "the time spent to prepare and submit to the Governor, an official in the legislative branch, an official in the executive branch, a constitutional officer, or a legislative committee oral and written proposals for, or testimony or analyses concerning, a legislative action." (Please see the attached definition of lobbying.)

What kinds of legislative action are covered by the law?

“Legislative action” is defined in 3 M.R.S.A. § 312-A(8) as “the drafting, introduction, consideration, modification, enactment or defeat of any bill, resolution, amendment, report, nomination or other matter by the Legislature, by either the House of Representatives or the Senate, any committee or an official in the Legislative Branch acting in his official capacity, or action of the Governor in approving or vetoing any legislative document presented to the Governor for his approval.”

What if a lobbyist communicates with a Legislator or an executive branch official for the purpose of influencing the official regarding a policy issue, but there is no proposed legislation related to that issue at that time? Is that lobbying?

The definition of legislative action includes the drafting of legislation and the introduction of legislation. So, communications made for the purpose of influencing how legislation will be drafted, what to include in the proposed legislation, or whether legislation will be introduced is lobbying.

If a lobbyist does not intend to influence the drafting or introduction of legislation, the communication is not lobbying. Lobbyists who are uncertain whether their communications qualify as lobbying are welcome to turn to the Commission staff for advice.

What about meetings with agency officials made for the purpose of obtaining information or documents or to conduct other research?

If the lobbyist is not communicating with the official for the purpose of influencing legislative action, the meeting is not lobbying. Meeting with agency officials to discuss policy matters in a general way, to explore an agency’s policy positions on issues, or to inquire how proposed legislation would affect an agency’s programs or operations is not lobbying. Merely gathering information or documents is not lobbying, even if the information or documents relate to a subsequent legislative proposal. There may be other types of communications or interactions with agency officials that would not be considered lobbying. The most important factor to determine whether some activity is lobbying is whether its purpose is to influence the agency official concerning a legislative action. If the lobbyist is uncertain, the Commission staff is available to provide specific guidance to the lobbyist.

What about other research or preparatory activities that are conducted before the lobbyist knows whether legislation will be introduced, such as:

- drafting a written history of current law in Maine for a client,
- conducting quantitative analysis on a policy issue of interest to a client, or
- engaging experts in the field to conduct research or to offer advice?

Research or analysis concerning legislative action only counts as lobbying if it is submitted to a covered official in the form of oral or written proposals, testimony, or analysis. If the analysis is conducted only to educate the lobbyist or client and is not submitted to a covered official, it is not lobbying.

If research or analysis is conducted and the lobbyist does not intend to use it to influence legislative action, the research or analysis is not lobbying. [*Option A (no clawback)*: Even if the research or analysis is later submitted to a covered official, it does not count as lobbying if at the time it was prepared the lobbyist did not intend to submit it to a covered official.] [*Option B (with a clawback)*: If the lobbyist later decides to submit the research or analysis to a covered official, the lobbyist should report the costs of the research or analysis at the time that the lobbyist makes or acts upon that decision.]

What about drafting legislation if the lobbyist does not intend to submit it to a covered official?

Lobbying includes “the time spent to prepare and submit to [covered officials] oral and written proposals for...legislative action.” (3 M.R.S.A. § 312-A(9)) If, at the time a legislative proposal is drafted, the lobbyist does not intend that it will be submitted to a covered official, the drafting is not lobbying. If the legislation is later submitted to a covered official, the drafting does count as lobbying. The Commission advises that the lobbyist should report any compensation and expenditures connected with the drafting as though they occurred during the month when the legislation is submitted.

What about monitoring the activities of agency officials regarding legislative action?

Monitoring the legislative plans or other activities of executive branch agencies is not lobbying, as long as there is no communication made to influence legislative action.

What about influencing other kinds of actions by executive branch agencies?

Communications with executive branch officials covered by this law only count as lobbying if they are made to influence legislative action (see definition above). Communicating with agency officials in an effort to influence other

kinds of administrative action, such as licensing, permitting, rate setting, or government procurement is not lobbying. Contacts with an agency to influence a rulemaking prior to the agency's adoption of rule changes do not count as lobbying because they are not intended to influence legislative action. If the rule changes are major substantive, communicating with a covered official to influence the Legislature's review of the adopted rule changes is lobbying.

GOVERNMENTAL OFFICIALS COVERED BY THE LAW

Which governmental officials are covered by the law?

The law covers:

- officials in the legislative branch ("a member, member-elect, candidate for or officer of the Legislature or an employee of the Legislature"),
- the Governor's cabinet and staff,
- officials in the executive branch, and
- constitutional officers.

Which officials in the executive branch are covered?

The term "[o]fficial in the executive branch" was introduced by Chapter 373. It refers to:

- an official in a major policy-influencing position listed in Title 5, Chapter 71,
- the Governor's cabinet and staff, and
- any individual in a major policy-influencing position in any other agency or independent agency as defined in 3 M.R.S.A. § 953, who is not specifically named in Title 5, Chapter 71.

Title 5, Chapter 71 [Sections 932-958] lists about 24 agencies and offices within Maine state government and designates 109 high-ranking positions within those agencies as being "major policy-influencing positions." These specified positions will be listed on the Commission's website as guidance for lobbyists.

The Governor's cabinet and staff are listed at www.maine.gov/governor. In the opinion of the Commission, the reference to "staff" in the phrase "the Governor's cabinet and staff" was intended to mean employees who work in the Office of the Governor and not the entire staffs of those agencies whose Commissioners or directors are in the Governor's cabinet.

In addition, "[o]fficial in the executive branch" includes "any individual in a major policy-influencing position in any other agency or independent agency, as defined in [Title 3,] section 953, who is not specifically named in Title 5,

Chapter 71.” Section 953(1) of Title 3 defines “agency” to mean “a governmental entity subject to review pursuant to this chapter, but not subject to automatic termination.” Title 3, Chapter 35 provides that a wide range of executive branch agencies and other state governmental offices be reviewed every eight years by their respective oversight committees in the Maine Legislature. The scope of offices subject to review under Chapter 35 is determined by Section 952:

This chapter provides for a system of periodic review of agencies and independent agencies of State Government in order to evaluate their efficacy and performance. Only those agencies, independent agencies or parts of those agencies and independent agencies that receive support from the General Fund or that are established, created or incorporated by reference in the Maine Revised Statutes are subject to the provisions of this chapter.
(underlining added)

The Commission advises that executive branch agencies covered under the new definition of lobbying include any agency that receives support from the General Fund or that is established, created, or incorporated by reference in the Maine Revised Statutes. Section 959 lists a review schedule for 93 agencies, organized by legislative oversight committee. That list does not appear to include all agencies that receive support from the General Fund or that are established or incorporated by reference in the Maine Revised Statutes. Thus, while this list provides a useful guide, it cannot be relied upon as all encompassing.

The state’s constitutional officers are the Attorney General, the Secretary of State, and the State Treasurer. Although some personnel in the offices of the Attorney General and the Secretary of State are listed in Title 5, Chapter 71, for reporting purposes lobbyists should count those officials as constitutional officers rather than as officials in the executive branch. Management-level employees in the Department of Audit, including the State Auditor, should be considered to be officials of the executive branch, because the State Auditor was established by the Maine Revised Statutes and is thus subject to review under Title 3, Chapter 35.

The term “official in the executive branch” only includes officials in a “major policy-influencing” position. Since that term is not defined in Maine Statutes, the Commission recommends that it would apply to those officials or employees of the agency who have policy development as a major function of their position.

EXCEPTION FOR LOBBYING A STAKEHOLDER GROUP

Chapter 373 created an exception to the definition of lobbying in 3 M.R.S.A. § 312-A(9) for persons “providing information to or participating in a subcommittee, stakeholder group, task force or other work group regarding legislative action” provided that the person’s “regular employment does not otherwise include lobbying.” Please see the attached definition of lobbying for the full exception.

The language “subcommittee, stakeholder group, task force or other work group” appears to be quite broad, but it is limited by the phrases “regarding legislative action” and “by the appointment or at the request of the Governor, a Legislator or legislative committee ...” The Commission interprets this to cover any group of individuals established by the Governor, a Legislator or legislative committee, constitutional officer, state agency commissioner, or a chair of a board or commission for purposes which include proposing, drafting, or influencing legislative action.

If the regular employment of the participant or the person providing information does include lobbying, the exception does not apply and all communications made to covered governmental officials in the stakeholder group to influence legislative action count as lobbying. It does not mean that the person’s other actions in the stakeholder group (e.g., discussing policy ideas unrelated to legislation, or proposing rules or administrative policies) would count as lobbying.

The Commission has been asked to interpret the clause “as long as the person’s regular employment does not otherwise include lobbying.” The Commission interprets this to mean that the exception does not apply to registered lobbyists and lobbyist associates. It also does not apply to other individuals whose employment, outside of the stakeholder group, includes paid lobbying activities even if they have not yet reached the registration threshold of 8-hours of lobbying in a calendar month.

If the lobbyist is not compensated by an employer for participating in or providing information to the stakeholder group, then those activities are not lobbying.

HOW TO REPORT EXECUTIVE BRANCH LOBBYING

How does a lobbyist report compensation received and expenditures made to lobby the Governor's staff, executive branch officials, and constitutional officers?

The law now requires you to report separately the amounts of compensation received and expenditures made to lobby legislative branch officials, executive branch officials, and constitutional officers. The Commission has updated Questions 5 and 6 on the monthly reporting form on its electronic filing website so that the compensation and expenditures can be reported separately in three fields. If the communication is made to influence, simultaneously, officials in two or more categories, the activity should be divided proportionally among the categories based upon whom the lobbyist sought to influence.

When a lobbyist is required to list a legislative action and a legislative document number has not been assigned, how much specificity is required?

Lobbyists are required to provide in their monthly reports "[a] list of each legislative action by Legislative Document or, if unknown, by Senate Paper or House Paper number or, if unknown, by topic or nomination in connection with which the lobbyist is engaged in lobbying" (3 M.R.S.A. § 317(1)(H))

Please use a brief description that provides some specificity about the particular program, regulation, or issue which is the subject of the communication. Avoid descriptions that are so broad as to convey little about what issue has been lobbied on.

<i>Unacceptable</i>	<i>Preferred</i>
Public Assistance	Eligibility criteria
Air Quality	Greenhouse gas emissions
Taxation	Business Equipment Tax Reimbursement
Animal welfare	Mass breeding facilities

In addition, please use a legislative request number if known.

If you have additional questions regarding reporting on executive branch lobbying, please telephone the Commission's PAC/Party/Lobbyist Registrar at (207) 287-4179.

Definition of Lobbying in 3 M.R.S.A. § 312-A(9)

“Lobbying” means to communicate directly with any official in the legislative branch or any official in the executive branch or with a constitutional officer for the purpose of influencing any legislative action or with the Governor or the Governor’s cabinet and staff for the purpose of influencing the approval or veto of a legislative action when reimbursement for expenditures or compensation is made for those activities. “Lobbying” includes the time spent to prepare and submit to the Governor, an official in the legislative branch, an official in the executive branch, a constitutional officer or a legislative committee oral and written proposals for, or testimony or analyses concerning, a legislative action. “Lobbying” does not include time spent by any person providing information to or participating in a subcommittee, stakeholder group, task force or other work group regarding a legislative action by the appointment or at the request of the Governor, a Legislator or legislative committee, a constitutional officer, a state agency commissioner or the chair of a state board or commission as long as the person’s regular employment does not otherwise include lobbying.

From: Kristine Ossenfort [mailto:Kossenfort@mainechamber.org]
Sent: Thursday, October 18, 2007 4:17 PM
To: Wayne, Jonathan
Subject: Draft Guidelines re Executive Branch Lobbying

Dear Jonathan,

Thank you for the opportunity to submit comments on the proposed draft guidelines prepared by the Commission staff with respect to the new executive branch lobbying requirements. I think the draft guidelines are very helpful but do have a couple of questions prompted by the new requirements that do not appear to be addressed by the current draft.

First, I would like to comment on the question in the proposed draft guidance with respect to research and other preparatory activities conducted before a lobbyist knows legislation will be introduced. I do have some concerns about the "clawback" proposal (the proposed Option B). Often research is done with no intention to submit it to a covered official. If it later proves relevant to pending or proposed legislation, it would be virtually impossible to reconstruct the time involved. Furthermore, how back in time would the clawback extend? 30 days? 6 months? Three years? I believe the clawback provision would prove to be unworkable and support Option A, "no clawback."

Some of the other questions that have arisen that do not appear to be addressed by the proposed guidelines include:

How should time be reported if individuals from two or more reportable categories are present at a meeting? For example, if a registered lobbyist or lobbyist associate attends a meeting for 1½ hours to discuss pending legislation and meets with a legislator and a major-policy influencing individual from an executive branch agency, or meets with a legislator, a major-policy influencing individual from an executive branch agency, and one of the constitutional officers, how should that time be reported? Do you report 1½ hours in one category (and if so, which one?), all relevant categories (which would grossly overstate the time and compensation for the time spent lobbying), or should the time be allocated equally between the relevant categories (for example, 1/2 hour executive branch, 1/2 hour legislative and 1/2 hour constitutional)? Such meetings are very common during the legislative session.

If time is spent lobbying a deputy or assistant attorney general, should that time be reported as lobbying the executive branch or a constitutional officer? Deputy and Assistant Attorney Generals are listed as major policy influencing positions in Title 5, chapter 71, technically putting them within the definition of an official in the executive branch; however, lobbying a deputy or assistant attorney general could be intended to influence the position of an executive branch agency or the position of the Attorney General, a constitutional officer, depending upon the situation and policy issue at hand. The same issues would also apply with respect to Deputy Secretaries of State who meet the

definition of "official in the executive branch" by virtue of their inclusion in Title 5, chapter 71, but are employed in the office of a constitutional officer, rather than by an executive branch agency.

Must time spent lobbying the State Auditor be reported and, if so, in which category should it be reported since the State Auditor does not appear to meet the definition of either an official in the executive branch or constitutional officer?

Must time spent preparing testimony or comments on a proposed major-substantive rule or proposed changes to a major-substantive rule be reported? The testimony and comments are made for the purposes of providing input on the proposed rule, but major-substantive rules are subject to review by the legislature. It would appear that, at the rulemaking stage, the contact with the executive branch agency is not lobbying, but I think it would be helpful if the Commission could provide some guidance.

I hope that these comments are helpful to you. Once again, thank you to you and your staff for all of your efforts to provide clarification on this issue!!!

Kris Ossenfort

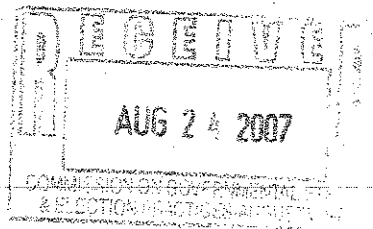
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August 23, 2007

Jonathan Wayne, Executive Director
Governmental Ethics and Election Practices
135 State House Station
Augusta, ME 04333-0135

Re: Public Law 2007, Chapter 373 – Executive Branch Lobbying

Dear Jonathan:

Thank you very much for meeting with John Delahanty and me to discuss various issues and implications with the recently enacted law, Chapter 373 pertaining to Executive Branch lobbying. During our meeting, we explained our need for guidance from you regarding the interpretation of certain provisions, terminology, and sections of the new law. Guidance and interpretation will help us ensure we are properly complying with the new law, both in our capacities as lobbyists, and as counsel providing advice. The following are the areas regarding which we requested further guidance and interpretation.

1. Official in the Executive Branch

Chapter 373 expands the definition of “lobbying” to include communications with “any official in the Executive Branch” (3 M.R.S.A. §312-A, §§9). The law further defines “official in the Executive Branch” as major policy-influencing positions, and “the Governor’s cabinet and staff” (3 M.R.S.A. §312-A, §§10-C). We are unsure whether the phrase “Governor’s cabinet and staff” refers to the Governor’s staff, the staff of cabinet agencies, or both. Interpretative guidance regarding which staff are meant by the expanded definition would be helpful, including which staff positions are included.

2. Official in the Executive Branch

As part of its expansion of the definition of “lobbying” to the Executive Branch, Chapter 373 defines the Executive Branch to include an “individual in a major policy-influencing position” and enumerated in Title 5, Chapter 71, and other agencies or independence agencies defined in 3 M.R.S.A. §953, who are not specifically named in Title 5, Chapter 71. Given the breadth of Chapter 71 and the vagueness of §953, we are unsure which individuals, agencies, or independent agencies fall within the scope of this particular requirement. We would encourage the Commission to provide on its website a definitive list of the positions that are included in this requirement, the agencies, and the independent agencies that are covered by this requirement.

Further, we are unsure as to which Boards and/or Commissions are included by this provision, and further guidance would be helpful. For example, are all licensing boards within the Department of Professional and Financial Regulation considered "independent agencies" for the purposes of the new definition of "lobbying" or as another example, is the Board of Overseers of the Bar included within this new definition of lobbying? We believe that further guidance and interpretation regarding the scope of this definition, and the agencies which are included will be extremely helpful.

3. Subcommittees, Stakeholder Groups, Task Forces

Chapter 373 states that if a "person's regular employment" does not include lobbying, then participation or providing information to subcommittees or stakeholder groups is not included lobbying. The term "regular employment", however, is not defined, and we would request guidance regarding the scope of this term. For example, does this mean a substantial portion of your employment is as a registered lobbyist (i.e., more than 50% of your time)?

4. Subcommittees, Stakeholder Groups, Task Forces

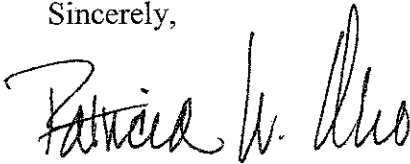
Chapter 373 also uses the new terms of "subcommittee, stakeholder group, task force or other work group" regarding a legislative action. (3 M.R.S.A. §312-A, §§9). Though definitions of the terms subcommittee, stakeholder group and task force would be helpful, the term "other work group" needs to be defined and guidance provided. This is a very broad and overarching term, and guidance regarding what the Commission will expect for disclosure regarding this term would be helpful.

5. Specifying separate activities

Chapter 373 now requires lobbyists separately to identify and report on compensation received for lobbying officials in the Executive Branch, the legislative branch, and constitutional officers. (3 M.R.S.A. §317, §§1 ¶D). This will require new forms, and guidance regarding how to report this new requirement prior to new forms being available will be helpful.

Again, we sincerely appreciate your willingness to discuss Chapter 373 with us, its implications, and the need for interpretative guidance in certain areas of this law. We appreciate your time and consideration in regards to our concerns.

Sincerely,



Patricia W. Aho, Esq.

ajg

cc: John D. Delahanty, Esq.
Martha Currier Demeritt

STATE OF MAINE
COMMISSION ON GOVERNMENTAL ETHICS & ELECTION PRACTICES
Mail: 135 State House Station, Augusta, Maine 04333
Office: 242 State Street, Augusta, Maine
Phone: (207) 287-6221 Fax: (207) 287-6775
Website: <http://www.maine.gov/ethics>
Electronic Filing: <http://mainecampaignfinance.com/public/home.asp>

example
of
monthly
report

LOBBYIST DISCLOSURE MONTHLY REPORT – LONG FORM

Lobbyist disclosure monthly reports are due by 5 p.m. on the 15th day of the month following the month which is the subject of the report. If the 15th day falls on a weekend or a holiday, the report is due the following business day. A penalty of \$100 may be assessed for every month the report is filed late. (Additional sheets may be attached as needed.)

1. This report covers lobbying activity conducted during the month of MARCH, 2007 (year)

2. Lobbyist name SOLTAN, CHARLES C.	
Business address P.O. BOX 188	Telephone (207)621-6300
	E-mail charles.soltan@soltanlaw.com
City, state, zip code AUGUSTA ME 04332-5307	Fax (207)621-6970

3. Employer name MAINE ASSOCIATION OF INSURANCE COMPANIES	Principal lobbyist contact name WALTER SMYTHE
Business address P.O. BOX 1960	Telephone (800)442-6071
	E-mail psmythe@patrons.com
City, state, zip code AUBURN ME 04211	Fax (207)783-7507

4. Enter the names of lobbyist associates who acted for the lobbyist in representing the employer during the month which is the subject of this report.

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5. Specify the dollar amount of compensation received for lobbying, the preparation of documents, and research for the primary purpose of influencing legislative action during the month which is the subject of this report. In the case of a regular employee, the specific dollar amount must be computed by multiplying the number of hours devoted to lobbying and the preparation of documents and research for the primary purpose of influencing legislative action by the employee's regular rate of pay based on a 40-hour week. DO NOT INCLUDE AMOUNTS LISTED IN ITEMS #6, #7A, #7B, 8 AND #9.

\$5,000.00

Legislative Branch Officials

Executive Branch Officials

Constitutional Officers

6. Specify the dollar amount of expenditures made during the month which is the subject of this report with regard to the preparation of documents and research for the primary purpose of influencing legislative action and to lobbying for which the lobbyist has been or expects to be reimbursed.

\$0.00

Legislative Branch Officials

Executive Branch Officials

Constitutional Officers

7A. Specify the total amount of money expended directly to or on behalf of one or more officials of the legislative branch, including members of the official's immediate family. \$ 0.00

7B. If a dollar amount was entered in section 7A, specify the amount for which the lobbyist has been or expects to be reimbursed.
\$ 0.00

8. Enter the name of any official in the legislative branch or member of that official's immediate family on whose behalf an expenditure of expenditures totaling \$25 or more were made during the month covered by this report and the date, amount and purpose of the expenditure or expenditures.

Name	Date	Amount	Purpose

9. Enter the date and a description of the event, and list all officials of the legislative or executive branch or members of an official's immediate family and the total amount of expenditures for the event, if the total amount of the expenditures for officials and family members total \$250 or more.

Date	Description	Official/family member	Amount

10. List each legislative action by Legislative Document number or, if unknown, by Senate Paper or House Paper number or, if unknown, by topic or nomination in connection with which the lobbyist is engaged in lobbying.

1038-1027-1046-1066-1083-109-1116-1125-114-1156-1166-1171-121-124-1253-1258-1262-1311-132-133-1345-1348-1372-1389-1390-1404-1415-1423-1453-1474-1475-1489-1502-1504-1587-160-161-1650-1655-1730-1750-1777-178-223-24-256-286-296-303-341-343-350-388-397-415-416-419-431-494-499-506-552-576-580-590-666-667-676-677-682-690-713-734-75-840-843-851-86-866-911-933-94-946-96

11. Specifically identify each legislative action, Legislative Document, Senate Paper, House Paper or nomination for which the lobbyist was compensated or expects to be compensated, or expended in excess of \$1,000 for lobbying activities related to those actions, and state the amounts compensated or expended for each.

1389	1,000.00
419	1,000.00
866	1,000.00

12. If the lobbyist is required to make a specific list of items in the preceding section of this form, list all original sources of any money received from that employer. "ORIGINAL SOURCE" means any person who contributes \$500 or more in any year directly or indirectly to any employer of a lobbyist, except that contributions of membership dues to nonprofit corporations formed under Title 13-B, any equivalent state law, or by legislative enactment are not considered contributions by an original source. If the employer or person who contributes to an employer is a corporation formed under Titles 13 or 13-A, nonprofit corporation formed under Title 13-B, or limited partnership under Title 31, list the corporation, nonprofit organization or limited partnership, not the individual members or contributors as the original source.

I, the undersigned, hereby swear or affirm that the information contained in this report is true and complete, and that no information is knowingly withheld.

SIGNATURE ON FILE

Signature of lobbyist or designee

4/10/2007

Date

Sworn falsification is a Class D crime(17-A M.R.S.A. Section 453).

THE COMMISSION MAY REJECT REPORTS THAT ARE INCOMPLETE.

NOTE: Violations of 17-A M.R.S.A. Chapter 25, are criminal offenses. Those provisions should be carefully reviewed before making expenditures on behalf of officials in the legislative branch.